

# Holland & Knight

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August 7, 2025

Honorable Sidney H. Stein  
United States District Judge  
United States District Court  
Southern District of New York  
Daniel Patrick Moynihan Courthouse  
500 Pearl Street  
New York, NY

**Re: 25-cv-5904, Pennantia, LLC v. Rose Cay Maritime, LLC and Dove Cay, LLC**  
**Request for Deadline Extension and to Exceed Page Limits**

Your Honor,

We represent Plaintiff Pennantia, LLC (“Pennantia”), and write to follow up on our request for an extension to Pennantia’s reply brief deadline and page extension request.

When we filed our letter earlier this evening, counsel for Defendant Dove Cay, LLC (“DC”) had not provided their position on Pennantia’s request. We have now received a response from DC’s counsel, who have advised as follows:

*As of now, we would request that you note that Dove Cay does not take a position with respect to Pennantia’s requests. However, should the Court grant Pennantia’s request, we would request that Tuesday’s hearing be adjourned 2-3 days, subject to the Court and counsel’s availability, so that our office may properly review Pennantia’s reply, and if need be, file a sur-reply to address any issues that Pennantia raises for the first-time in its reply brief.*

As Your Honor knows, Pennantia has significant concerns with the impact that the Notices of Liens that are filed with the U.S. Coast Guard on the Pennantia Fleet vessels. Furthermore, a decision by Your Honor on the maritime lien issue will very likely be seen as highly relevant in the Panamanian court arrest action. Hence, Pennantia would object to postponing the Tuesday hearing, especially as the primary “first-time” issue that Pennantia will raise in its reply relates to the CTMA – a contract dated April 14, 2022 that Pennantia had a right to obtain under the Ship Management Agreement and which Pennantia had requested repeatedly. DC should not get a right of sur-reply when RCM (also controlled by Mr. Parker) should have produced the CTMA years ago.

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We thank Your Honor for his attention to this matter, and look forward to receiving the Court's decision.

Respectfully submitted,

HOLLAND & KNIGHT LLP

s/ Michael J. Frevola  
Michael Frevola